

REMARKS

By the above, no claims have been amended, added, or canceled. As such, Claims 1-4, 6-33, and 35 are pending in this application—Claims 19-32, and 35 being withdrawn.

Reconsideration of the present application and all pending claims are respectfully requested

In the Office Action, it is contended that *Fujisawa* teaches to tilt the wafer for correcting distortion. In this respect, the Office Action refers to passages of *Fujisawa*. The Applicant submits however, that none of these passages relate to distortion. The term “distortion” occurs frequently in *Fujisawa*, but only in connection with the distortion of a retical shape (for example para. 95). In this context, the term “distortion” does not denote an aberration, but a mechanical deformation which may in itself cause various aberrations.

The Applicant notes that the only exception is paragraph 66, in which the term “distortion” indeed denotes an aberration. In this paragraph however, it is only described that distortion and other aberrations can be corrected by finally driving lens elements in the optical axis direction and by tilting such lens elements using driving elements (e.g., piezo electric elements).

In *Fujisawa*, the drive voltage (drive amount) to each driving element is controlled by a lens control unit 113. In contrast, the wafer recited in limitation d) (e.g., pending claim 1) is not a lens element, and the Applicant respectfully submits that there is no motivation or teaching in *Fujisawa* not to tilt a lens element, but instead tilt the wafer as claimed.

Fujisawa is not concerned with correcting distortion or any other aberration by tilting the wafer. Instead, it is concerned about aberrations produced by a curved wafer (see Figs. 3A-3C). Conventionally, a curved wafer is tilted such that the average distance of its surface from the image plane of the projection objective is reduced, as is indicated in Figs. 3B-3C. *Fujisawa* teaches not only to tilt the wafer (see Fig. 4A), but also to correct a residual curvature-of-field (see Fig. 4B) by driving and tilting the lens elements in the objective controlled by the lens control unit 113. Fig. 4B shows in its lower portion the remaining amount of curvature-of-field (see para. 85).

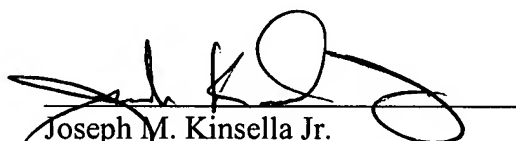
It is therefore believed that *Fujisawa* neither teaches nor motivates a person skilled in the art to tilt the wafer for correcting a distortion; and in particular, not the very specific distortion recited in limitation b) of Applicant’s Claim 1. Accordingly, Applicant respectfully submits that

the present application is in condition for allowance and thus requests notice of same.

If any charges or fees must be paid in connection with the following communication, they may be paid out of our Deposit Account No. 50-0545.

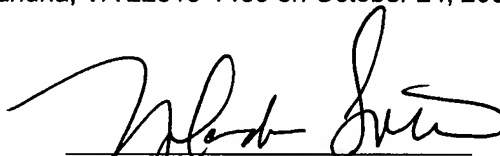
Respectfully submitted,

Dated: October 24, 2007


Joseph M. Kinsella Jr.
One of Applicant's Attorneys

CERTIFICATE OF FIRST CLASS MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Mail Stop – RCE, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on October 24, 2007.


Yolanda Solis